

Jesus A. Uribe Londono
Prison No. 18870-069
FMC Devens Prison
P.O. Box 879
Ayer, MA 01432
Pro Se Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff
v.
JESUS A. URIBE LONDONO
Pro Se Defendant

)
Case Number:
3:00-cr-92
Judge Jose A. Fuste

CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

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2005 APR 22 PM 1:47

MOTION BY PRO SE DEFENDANT
REQUESTING THE COURT TO RECONSIDER
IT'S MARCH 31, 2005 ORDER DENYING
THE DEFENDANT'S MOTION TO RETURN
PROPERTY NOT RELATED TO THE CASE

CONSOLIDATED DECLARATION AND ARGUMENT
BY PRO SE DEFENDANT REQUESTING THE COURT
TO RECONSIDER IT'S MARCH 31, 2005 ORDER
DENYING THE DEFENDANT'S MOTION TO RETURN
IMPORTANT WORK RELATED MATERIAL
THAT IS NOT RELATED TO THE CASE
AND CANNOT BE REPLACED BY THE DEFENDANT

DECLARATION AND AFFIRMATION

Jesus A. Uribe Londono, Pro Se Defendant, hereinafter, Defendant, declares and affirms under penalty of perjury that the instant filing is true.

DEFENDANT HUMBLY REQUESTS THE COURT
TO RECONSIDER ORDERING THE RETURN
OF THREE (3) SPECIFIC WORK RELATED ITEMS
WHICH ARE LISTED AND DETAILED BELOW
IN ORDER OF PRIORITY
WHICH THE DEFENDANT PRAYS
FOR THE APPROVAL OF THERE RETURN

1. Notebooks - ten (10) or more - the contents encompass over twenty five (25) years within my professional career, and contain handwritten notes on field work pertaining to environmental observations and assessments for consulting

jobs of which I was involved with several national and international organizations (i.e.; banks, engineering companies, etc.). These notes give detailed descriptions of natural resources, land use, pollution and other environmental impact and mitigation proposals required for project financing and approval. Copies were received with Discovery but were unreadable.

2. **Address books and business cards** - one thousand (1000) or more - contain company names and staff contacted during the above described consulting jobs. Most of these items were received as part of the initial discovery produced by the Government, but was unreadable.

3. This material would be extremely important for my future work, and help with my re-integration and ability to be helpful to society as a whole.

CONCLUSION

Based on all the papers filed in the instant action and criminal proceedings, the Defendant is humbly and respectfully requesting this Honorable Court to reconsider ordering the return of these three (3) work related items, of which the Defendant will graciously accept whatever material within these items, that are deemed not related to the criminal proceeding.

Dated: 4/15/05 By: / Uribe/
Respectfully submitted,
(2) Jesus A. Uribe Londono
Pro Se Defendant

PROOF OF SERVICE

Jesus A. Uribe Londono, Pro Se Defendant, declares and affirms under penalty of perjury that he served the Assistant U.S. Attorney named below with a true copy of his Motion for Reconsideration, by FMC Devens legal mail on: 4/15/05.

1. Maritza Gonzalez de Miranda

U.S.D.C.P.R. No. 208801

Assistant U.S. Attorney

Torre Chardon Suite 1201

Carlos Chardon Avenue #350

Hato Rey, Puerto Rico 00918

By: J. Uribe

Jesus A. Uribe Londono

Pro Se Defendant

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